

SERGENIAN LAW

a Professional Corporation

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Counsel for Defendant
LAJERRIO JEWELRY

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

VERRAGIO, LTD.,

Plaintiff,

v.

LAJERRIO JEWELRY,

Defendant.

Case No. 2:23-cv-02362-JAK-Ex

Hon. John A. Kronstadt

**NOTICE OF MOTION OF
ATTORNEYS SHENGMAO MU
AND DAVID SERGENIAN FOR
LEAVE TO WITHDRAW AS
COUNSEL OF RECORD FOR
LAJERRIO JEWELRY**

DATE: January 29, 2023

TIME: 8:30 a.m.

PLACE: 10B

TO ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to Local Rule 83-2.3, on January 29, 2023 at 8:30 a.m., or as soon as the matter may be heard by the Honorable John A. Kronstadt, whether virtually or in Courtroom 10B, located in the United States Courthouse, 350 West 1st Street, Los Angeles, CA, 90012, Shengmao Mu and David Sergenian will and hereby do move the Court for an order allowing Shengmao Mu and David Sergenian to withdraw as counsel of record for Defendant Lajerrio Jewelry.

Pursuant to Local Rule 83-2.3.2, Shengmao Mu and David Sergenian have provided written notice to Defendant and, by this Notice, provide further written notice to all parties, through their respective counsel of record, of Shengmao Mu and David Sergenian's motion to withdraw as counsel. Furthermore, pursuant to Local Rule 83-2.3.4, Shengmao Mu and David Sergenian informed Defendant on December 7, 2023, of the consequences of its inability, as organizations, to appear pro se before this Court.

Good cause exists to permit the withdrawal because: (a) there has been a complete breakdown in the attorney-client relationship between Defendant on the one hand and Mr. Mu and Mr. Sergenian on the other hand; and (b) Defendant discharged Shengmao Mu and David Sergenian and pursuant to the California Rules of Professional Conduct, attorneys are required to seek leave of court to withdraw under such circumstances. In addition, these reasons constitute good cause under L.R. 83-3.1.2 for leave to withdraw.

The Motion is based on this Notice of Motion, the concurrently filed memorandum of points and authorities, the declaration of Shengmao Mu, and on all pleadings and documents on file in this case and oral argument as may be presented to the Court.

This Motion is made following the conference of counsel pursuant to L.R. 7-3, which took place on December 12, 2023.

Dated: December 19, 2023

Respectfully submitted,

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By: /s/David A. Sergenian

DAVID A. SERGENIAN

Counsel for Defendant
LAJERRIO JEWELRY

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